

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF NORTH CAROLINA  
DURHAM DIVISION**

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In re:

**Cassandra Gore,**

Bankruptcy Case No.: 05-82613

Social Security No. xxx-xx-4930

Mailing Address: 2 Kilburn Lane, Durham, NC 27707-

Debtor.

**MOTION TO REOPEN CASE**

Now comes the debtor above-named, and shows unto the Court as follows:

1. That this matter is a core proceeding pursuant to 28 U.S.C. Section 157, and that the Court has jurisdiction pursuant to 28 U.S.A. Sections 151, 157 and 1334.
2. That the debtor(s) file(s) this motion pursuant to 11 U.S.C. Section 350(b) to reopen this case.
3. That prior to the completion of her Chapter 13 plan and discharge granted in this case, the debtor had a mortgage serviced or held by FCI Lender Services, Inc. , Steel Capital Steel, L.L.C., Statebridge Company, L.L.C. and/or Home Loan Servicing, Inc., which had been paid during her Chapter 13 plan.
4. That subsequently, FCI Lender Services, Inc. , Steel Capital Steel, L.L.C., Statebridge Company, L.L.C. and/or Home Loan Servicing, Inc., have asserted a mortgage acreage of \$18,366.87;
5. That FCI Lender Services, Inc. , Steel Capital Steel, L.L.C., Statebridge Company, L.L.C., Home Loan Servicing, Inc., and David A. Simpson, have commenced foreclosure proceedings against the Debtor.
6. The reopening of this case is necessary to afford the debtor the opportunity to bring an Adversary Proceeding against FCI Lender Services, Inc. , Steel Capital Steel, L.L.C., Statebridge Company, L.L.C., Home Loan Servicing, Inc. And David A. Simpson, P.C. For a determination of that status and balance of her mortgage at the end of her Chapter 13 case and for actual, statutory, and punitive damages, including for attorneys' fees.

WHEREFORE, the debtor moves the Court to reopen this case, for an order directing FCI Lender Services, Inc. , Steel Capital Steel, L.L.C., Statebridge Company, L.L.C. and/or Home Loan Servicing, Inc. to halt any foreclosure proceeding and for such other and further relief as the court may seem just and proper.

Dated: July 5, 2011

**LAW OFFICES OF JOHN T. ORCUTT, P.C.**

/s Edward Boltz  
Edward Boltz  
Attorney for the Plaintiff  
North Carolina State Bar No.: 23003  
1738-D Hillandale Rd.  
Durham NC 27705  
(919) 286-1695  
[eboltz@johnorcutt.com](mailto:eboltz@johnorcutt.com)

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Mailing Address: 2 Kilburn Lane, Durham, NC 27707-

Debtor.

**CERTIFICATE OF SERVICE**

I, Renee Nolte, certify, under penalty of perjury, that I am, and at all times during this service of process was, not less than 18 years of age and not a party to the matter concerning which service of process was made, and that service of MOTION TO REOPEN on June 23, 2011, by **regular, first class United States mail**, postage fully pre-paid, addressed to:

Richard M. Hutson, II  
Chapter 13 Trustee

Michael D. West  
Bankruptcy Administrator  
Post Office Box 1828  
Greensboro, NC 27402

Statebridge Company, L.L.C.  
**Attn: Managing Agent**  
4600 South Syracuse Street  
Suite 700  
Denver, CO 80237

Home Loan Servicing, Inc.  
**Attn: Managing Agent**  
Post Office Box 1838  
Pittsburgh, PA 15230-1838

Statebridge Company, L.L.C.  
**Attn: Managing Agent**  
National City Bank Of Indiana  
150 Allegheny Center IDC 24040  
Pittsburgh, PA 15212

Matthew Mckee  
**Attorney**  
2701 Coltsgate Rd.  
Suite 300  
Charlotte, NC 28211-

FCI Lender Services, Inc.  
**Attn: Managing Agent**  
8180 East Kaiser Blvd.  
Anaheim CA 92808

David A. Simpson  
**Substitute Trustee**  
6047 Tyvola Glenn Circle  
Charlotte NC 28217

FCI Lender Services, Inc.  
**C/o National Registered Agents, Inc.**  
120 Penmarc Drive  
Raleigh NC 27603

Roberts Townsend & Thomas, P.C.  
2550 West Tyvola Rd.  
Suite 520  
Charlotte NC 28217

Steel Capital Steel, Inc.  
**Attn: Managing Agent**  
2500 North Tucson Blvd.  
Suite 140  
Tucson, AZ 85716

Steel Capital Steel, L.L.C.  
**C/o Incorp Services, Inc**  
2360 Corporate Circle  
Suite 400  
Henderson NV 89074-772

and also by **certified mail, return receipt requested**, addressed to:

Statebridge Company, L.L.C.  
**Attn: Managing Agent**  
4600 South Syracuse Street  
Suite 700  
Denver, CO 80237

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**Attn: Managing Agent**  
Post Office Box 1838  
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/s Renee Nolte  
Renee Nolte